

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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I, Daniella Levi, Esq., pursuant to 28 U. S.C. § 1746, declare as follows:

1. I am the Chief Executive Officer of IME WatchDog, Inc. (hereinafter “Plaintiff”) in the above-referenced case.

2. I submit this declaration in opposition to Defendants’ letter motion for reconsideration of this Court’s May 3, 2024 Minute Order.

3. Plaintiff received bookings for independent medical examinations (“IMEs”) from The Gucciardo Law Firm PLLC (“Gucciardo”) initially from June 2021 until July 2021 when Defendants stole this customer using Plaintiff’s misappropriated trade secrets.

4. After the issuance of the court-authorized notice, Gucciardo resumed booking with Plaintiff from May 31, 2023 until April 4, 2024.

5. Most recently, Gucciardo booked IMEs with Plaintiff for January 25, 2024, February 23, 2024, March 1, 2024, and twice on April 4, 2024.

Case No.: 1:22-cv-1032 (PKC) (JRC)

**DECLARATION OF DANIELLA LEVI,
ESQ, IN OPPOSITION TO
DEFENDANTS’ LETTER
MOTION FOR RECONSIDERATION**

6. Gucciardo has not booked any further IMEs with Plaintiff until they received notice from my attorneys on April 16, 2024 that this Court issued an Order permitting Defendants' counsel to contact them.

7. This is what will happen with any customers who are forced to become embroiled in this litigation and dragged in for a hearing or otherwise, thus causing Plaintiff further irreparable harm.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 6, 2024.

Daniella Levi
Daniella Levi (May 6, 2024 18:07 EDT)
Daniella Levi







2024-05-06 FINAL Levi Declaration re Gucciardi

Final Audit Report

2024-05-06

Created:	2024-05-06
By:	Emanuel Kataev (mail@emanuelkataev.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAaKa0gdbpxDgUpC7Dnlpqriokb798ayvq_

"2024-05-06 FINAL Levi Declaration re Gucciardi" History

-  Document created by Emanuel Kataev (mail@emanuelkataev.com)
2024-05-06 - 9:54:23 PM GMT- IP address: 70.18.39.10
-  Document emailed to daniellalevi@levilawny.com for signature
2024-05-06 - 9:54:42 PM GMT
-  Email viewed by daniellalevi@levilawny.com
2024-05-06 - 10:06:36 PM GMT- IP address: 108.29.44.50
-  Signer daniellalevi@levilawny.com entered name at signing as Daniella Levi
2024-05-06 - 10:06:58 PM GMT- IP address: 108.29.44.50
-  Document e-signed by Daniella Levi (daniellalevi@levilawny.com)
Signature Date: 2024-05-06 - 10:07:00 PM GMT - Time Source: server- IP address: 108.29.44.50
-  Agreement completed.
2024-05-06 - 10:07:00 PM GMT